

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

IN RE: JULIE A MOORE  
RICHARD MOORE  
8 KINGS COURT  
CLIFTON PARK NY 12065

Case No.: 10-11841  
Chapter 13  
HEARING DATE: Nov 18, 2010

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**TRUSTEE'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**  
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Andrea E. Celli, Chapter 13 Standing Trustee for the Northern District of New York (the "Trustee") states the following as and for her objection to confirmation of the Chapter 13 Plan. The Debtor(s) filed the petition for relief on May 13, 2010.

The Proposed Plan is as follows:

\$850.00 X 60 MOS, MIN 4% TO UNSEC

The Trustee objects to the confirmation of the proposed plan on the following grounds:

The Trustee has determined that the debtor'(s)' income is below the State Median Income.

X DISPOSABLE INCOME: The Debtor(s) has/have failed to provide for the submission of all disposable income, pursuant to 11 U.S.C. Section 1325(b)(1)(B).  
-NEED INFO

X LIQUIDATION: The Plan does not provide general unsecured Creditors with at least as much as they would have received if the Debtor had filed a Chapter 7 liquidation proceeding as required pursuant to 11 U.S.C. Section 1325(a)(4). Trustee's initial minimum liquidation calculation = \$ .00 .  
-NEED INFO

X INFORMATION NEEDED: The Trustee cannot determine if all provisions of 11 U.S.C. Section 1325 have been met and requests additional information to assist in her determination, as follows:  
-CMI DOCS AND ATTY ANALYSIS  
-VALUE OF ASSETS/INTEREST IN EVALUATION, INC.  
-A/R (DATE OF FILING)

**WHEREFORE**, the Trustee respectfully requests that this Court issue an Order denying confirmation of the plan or briefly adjourning the hearing on confirmation to allow the movant to resolve the objection contained herein.

Dated: November 10, 2010

/S/ ANDREA E. CELLI  
Andrea E. Celli, Chapter 13 Trustee  
7 Southwoods Blvd.  
Albany, New York 12211

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**CERTIFICATE OF MAILING**  
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The undersigned hereby certifies that a copy of this objection was mailed this date to the parties noted below:

Dated: November 10, 2010

Signed: /s/ BONNIE DUELL

Debtor(s) above

Attorney: BRIAN BRONSTHER  
930 ROUTE 146  
CLIFTON PARK, NY 12065

Sworn to me on this the 10th day of November, 2010.

/s/ Sandra Spring

Notary Public State of New York  
SANDRA SPRING, NOTARY PUBLIC, STATE OF NEW YORK  
QUALIFIED IN RENNSSELAER COUNTY #4955344  
COMMISSION EXPIRES AUGUST 28, 2013